

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendants.

CRIMINAL NO. 22-342 (SCC)

**MOTION FOR PROTECTIVE ORDER PURSUANT TO SECTION 3 OF THE
CLASSIFIED INFORMATION PROCEDURES ACT**

Pursuant to Section 3 of the Classified Information Procedures Act, 18 U.S.C. App. III (CIPA), the “Revised Security Procedures Established Pursuant to Pub. L. 96-456, 94 Stat. 2025, by the Chief Justice of the United States for the Protection of Classified Information” (“Security Procedures”) (reprinted after CIPA Section 9), Rules 16 and 57 of the Federal Rules of Criminal Procedure, and the general supervisory powers of the Court, and to protect the national security, the Government moves the Court to enter the proposed Protective Order, attached hereto, regarding the disclosure and dissemination of classified national security information.

During the litigation of this case and in preparation for trial, the Government has become aware that one or more defendants may seek to raise defenses that implicate classified national security information. Any defendant seeking to do so is required to provide written notice to the Government and the Court pursuant to CIPA Section 5. Because such filings will relate to information that may be classified, the proposed Protective Order, if entered, would establish a Secure Area / Sensitive Compartmented Information Facility in the District of Puerto Rico where the defendants could prepare such filings. This Secure Area would also be used, if needed, by the

Court and the defendants in the lead up to the trial, in so far as classified national security information is determined to be relevant and admissible to the same.

The parties have met and conferred regarding this Motion but were unable to reach agreement on the scope of the Protective Order. The Government's understanding is that, due to a limited number of outstanding disagreements, some or all of the defendants may oppose this Motion. To the extent the defendants raise objections to the proposed Protective Order, the Government requests the opportunity to respond. Notwithstanding these disputes, the Government requests that the Court enter the proposed Protective Order pursuant to CIPA Section 3, which provides that, upon a motion by the Government, the Court shall enter the Protective Order. *See* 18a U.S. Code § 3.

Certificate of Service

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

RESPECTFULLY SUBMITTED, this 24th day of June, 2024.

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S Department of Justice

/s/ Ryan R. Crosswell
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